

April 20, 2018

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258*

Dear Ms. Dortch,

Charter Communications, Inc. (“Charter”) appreciates the wireless industry’s support for Priority Access Licenses (“PALs”) in the 3550-3700 MHz band (“3.5 GHz Band”) that are smaller than Partial Economic Areas. Throughout this proceeding Charter has advocated that adopting smaller licensing areas would increase competition, spur investment, and promote innovation, resulting in more and better broadband services for consumers.

Specifically, we understand that the wireless industry supports reducing license areas to Metropolitan Statistical Areas (“MSAs) in the largest markets and to counties in the smaller markets. We respectfully ask that the Commission also consider opening up the top ten percent of MSA markets to competition by similarly reducing these license areas to counties to significantly expand the competitive bidding and new entry into urban areas.

As noted by stakeholders across the industry, the 3.5 GHz band spectrum is a critical component of the international race to 5G,¹ and Charter is already investing in robust trials to examine mobile and fixed wireless uses of the 3.5 GHz band (among others) in multiple markets throughout the country, including in Tampa, Florida; Bakersfield, California; Denver, Colorado; Coldwater, Michigan; Charlotte, North Carolina; and Lexington, Kentucky. Informed by testing results, and assuming the right rules are

¹ See Remarks of FCC Commissioner Michael O’Rielly Before the CBRS Alliance, at 2 (Aug. 1, 2017) (“[T]he international focus on 5G spectrum has now shifted to the mid bands that carry more data than low bands...[a]nd the 3.5 GHz band is in the spotlight.”).

adopted, Charter believes the 3.5 GHz band could be used to deploy innovative mobile and fixed wireless services. Charter's own testing results to date have demonstrated the possibility of using the spectrum to provide wireline-like broadband connectivity and speeds to areas beyond the reach of its wired network, including to those in rural and underserved areas. We look forward to expeditious adoption of fair rules that will foster deployment and a meaningful opportunity for new entry.

Respectfully submitted,

/s/ Elizabeth Andrion

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